

## Anna Marie Young

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**From:** Stetson, Luree [luree.stetson@conservation.ca.gov]  
**Sent:** Thursday, December 17, 2009 3:07 PM  
**To:** Anna Marie Young  
**Subject:** Amador County Transportation Commission

To: Sustainable Communities Planning Grant and Incentive Program  
C/O The Department of Conservation  
Office of Sustainability

RE: Comments from the Amador County Transportation Commission of the Draft Prop 84 Planning Grant Program Guidelines

ACTC appreciates the opportunity to provide input on the draft guidelines for the Prop 84 Planning Grant Program and offers the following comments;

**1.) There should not be a set-aside in the Planning Grant Program for MPOs.**

MPOs receive multiple sources of revenue to support their planning efforts that are not available to other local and/or regional agencies that are anticipated to seek funding from this program. It should be noted that MPOs have already received \$12 million in especially dedicated funding from this Prop 84 for Modeling Incentives. Of the \$90 million in Prop 84 funds set aside for sustainability planning incentives, we believe it is **severely** inequitable for only 18 agencies to receive both \$12 million from the Modeling Incentive Program as well as an addition to \$20 million from the Planning Grant Program. This \$32 million figure would represent approximately 35% percent of the total funding available being especially dedicated to 18 agencies, thereby creating an inherent inequity in the distribution of program resources.

**2.) The proposed \$1,000,000 funding cap on awards should remain and no allowance should be made to increase awards beyond this figure for any reason.**

In light of many local & regional agencies interest in this program, demand from applicants is anticipated to be great. Making any awards higher than the proposed \$1mill cap would necessarily require fewer total awards being issued, which would lessen the statewide impact this program would have.

**3.) Applications from MPOs should be cross-referenced with awards made under the Modeling Incentive Program to ensure that duplicative awards are not made.**

Seasoned grant program managers can point to many cases where an agency simply re-titled and edited a grant application that was previously awarded under a different program. Awarded project should be significantly different in scope than previously awarded proposals and duplicative tasks and/or methodologies should disqualify an application from being awarded.

**4.) MPOs should not be allowed to rank any of the applications submitted to this program.**

Grant competitors should not be allowed to rank each other as this scenario would represent an inherent conflict of interest.

**5.) Consistency with SB 375 goals and existing blueprint documents should not be used as evaluation criterion when ranking proposals.**

While this may be a legitimate concern for the state's 18 MPOs, many local and regional agencies have not yet developed or adopted SB 375 compliant Sustainable Communities Strategies or blueprint documents. Indeed, many local land-use agencies and rural RTPAs who are not under SB 375 mandates may nevertheless be interested in voluntarily moving in that direction and may request funding from this program to do so. Such agencies taking this voluntary initiative should not be penalized with restrictive criterion that is not required of them or may not even yet be available to them to comply with in the first place.

**6.) Do not establish criterion that would systematically eliminate eligibility of local land use agencies and rural RTPAs, many of who are embarking on their own sustainability planning efforts.**

The comments submitted by CALCOG, MTC, and ABAG, if accepted, would essentially eliminate eligibility of the vast majority of local agencies and rural RTPA throughout the state. ACTC believes this is not the intention of Prop 84 or SB 372. Further, these proposals to establish a "Regional Set-aside" are worded such that rural RTPAs (non-MPO) would not be eligible for funding. In the case of Amador County, while we are not under the mandates of SB 375, we are still voluntarily moving forward with many sustainability best practices established by both SB 375 and the RTP Guidelines on

developing Sustainable Communities Strategies in order to meet the intent of AB 32. If such restrictive guidelines were adopted for this program, ACTC's efforts (that are in line with the intentions of AB 32/SB 375 and Prop 84/SB 732) would not be eligible for funding. This runs contrary to the intent of these legislations and the sustainability movement in general.

Thank you for considering these comments in the revision of the draft guidelines for the Planning Grant Program. We look forward to an equitable and efficient distribution of these precious resources.

Respectfully,

Neil

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